

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 2014-cv-30100-MGM

FAITH JOHNSON,

Plaintiff

v.

AMHERST NURSING HOME, INC. D/B/A  
CENTER FOR EXTENDED CARE AT  
AMHERST, KEENA KEERNAN and RASIDI  
AKODO,

Defendants

**PLAINTIFF'S MOTION FOR LEAVE OF COURT TO AMEND COMPLAINT AND  
JURY DEMAND**

NOW COMES the Plaintiff, Faith Johnson, and respectfully requests leave to amend her Complaint and Jury Demand, pursuant to Fed. R. Civ. P. 15 and otherwise. The Plaintiff seeks to amend her Complaint and Jury Demand to clarify the claims contained therein as well as to correct the spelling of the individual defendant – Keena Keeran.

As reasons therefor, the Plaintiff states that the Defendants will not be prejudiced by the allowance of this Motion and only the Plaintiff would be prejudiced if this Motion is not allowed. In support of this Motion, the Plaintiff refers the Court to the attached Memorandum in Support of Plaintiff's Motion for Leave of Court to Amend Complaint and Jury Demand and a proposed Amended Complaint.

WHEREFORE, the Plaintiff, Faith Johnson, respectfully requests that this Court allow her leave to file an Amended Complaint (attached hereto).

Respectfully submitted,

The Plaintiff  
FAITH JOHNSON  
By Her Attorney

/s/ Michael O. Shea  
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Dated: August 26, 2014

LOCAL RULE 7.1 CERTIFICATION

I, Michael O. Shea, Esq., Counsel for the Plaintiff, hereby certify that I conferred with Counsel for the Defendants, Meghan B. Sullivan, Esq., pursuant to Local Rule 7.1 via electronic mail on August 26, 2014 regarding the instant Motion but to no avail.

/s/ Michael O. Shea  
Michael O. Shea

CERTIFICATE OF SERVICE

I, Michael O. Shea, Esq., hereby certify that on the 26<sup>th</sup> day of August, 2014, I served the foregoing document by electronic filing through the ECF system to Counsel of Record for the Defendants.

/s/ Michael O. Shea  
Michael O. Shea